

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

ZHARVELLIS HOLMES, as Independent)	
Administrator of the Estate of)	
MARCELLIS STINETTE, deceased,)	
)
Plaintiff.)	Court No.: 20 cv 6437
)
V.)	Judge Elaine Bucklo
CITY OF WAUKEGAN, OFFICER)	
DANTE SALINAS, OFFICER JAMES)	Mag. Judge Sunil R. Harjani
KEATING and WAUKEGAN POLICE)	
CHIEF WAYNE WALLES,)	
)
Defendants.)	

MOTION TO WITHDRAW AS COUNSEL FOR PLAINTIFF

NOW COME ASHLEY M. MURRAY, MATTHEW M. POPP, and CAMERON J. TOBER, and respectfully requests an Order of Court, pursuant to LR 83.17, allowing ASHLEY M. MURRAY, MATTHEW M. POPP, and CAMERON J. TOBER to withdraw their appearances as attorneys of record for Plaintiff, ZHARVELLIS HOLMES, as Independent Administrator of the Estate of MARCELLIS STINNETTE, deceased, and states:

1. O'CONNOR LAW FIRM, LTD. was retained to represent the Plaintiff, ZHARVELLIS HOLMES in this matter.
2. On or about October 29, 2020, a complaint was filed by O'CONNOR LAW FIRM, on behalf of Plaintiff, signed by attorney Kevin W. O'Connor.
3. Also, on or about October 29, 2020, appearances were filed by O'CONNOR LAW FIRM, LTD, for attorneys Kevin W. O'Connor, Ashley M. Murray, Matthew M. Popp, and

Cameron J. Tober.

4. In January 2021, Plaintiff, ZHARVELLIS HOLMES, as Independent Administrator of the Estate of MARCELLIS STINNETTE, advised Kevin W. O'Connor that she was terminating representation by O'Connor Law Firm, Ltd. and had obtained new counsel.
5. On or about January 26, 2021, POWER ROGERS, LLP, new counsel for Plaintiff, ZHARVELLIS HOLMES, as Independent Administrator of the Estate of MARCELLIS STINNETTE, filed a Motion to Substitute in as new counsel for Plaintiff. Attached to said motion was a Substitution of Attorneys, signed and executed on behalf of O'CONNOR LAW FIRM, LTD. by Kevin W. O'Connor. (See Motion and Substitution attached as Exhibit A).
6. A review of the Motion to Substitute and Substitution of Attorneys, shows that the Substitution of Attorneys reads, "We hereby withdraw our appearance as attorneys for Zharvellis Holmes, as Mother of Marcellis Stinnette, deceased." It is signed, O'CONNOR LAW FIRM, LTD., by Kevin W. O'Connor.
7. It was the intent that all counsel of record for O'CONNOR LAW FIRM, LTD. would be withdrawn at this time. However, it appears by clerical mistake, that the names of the attorneys (other than Mr. O'Connor) were not listed in the Substitution of Attorneys.
8. On or about August 30, 2024, it was brought to our attention by counsel, Blake Horowitz, that this clerical error had been made. Mr. Horowitz is counsel in a related matter with a currently pending motion to consolidate (1:22-cv-06931).
9. I, Ashley M. Murray, have not been employed by O'CONNOR LAW FIRM, LTD. since

December 31, 2022.

10. I, Cameron J. Tober, have not been employed by O'CONNOR LAW FIRM, LTD. since January, 2022.
11. I, Matthew M. Popp, have not been employed by O'CONNOR LAW FIRM, LTD. since September, 2022.
12. We, Ashley M. Murray, Matthew M. Popp, and Cameron J. Tober, have not been engaged in any representation of Plaintiff since she elected to terminate representation by O'CONNOR LAW FIRM, LTD. in January, 2021.
13. Attorneys, Ashley M. Murray, Matthew M. Popp, and Cameron J. Tober, hereby move to withdraw their appearances on behalf of Plaintiff, ZHARVELLIS HOLMES in this matter.
14. Notice of Motion to Withdraw has been sent directly to Plaintiff, ZHARVELLIS HOLMES at 6407 Hughes Street, Jacksonville, Florida 32219.
15. Notification of Party Contact Information is attached hereto. (See Exhibit B).

WHEREFORE, ASHLEY M. MURRAY, MATTHEW M. POPP, and CAMERON J. TOBER, respectfully request that this Honorable Court grant this Motion to Withdraw as Counsel for Plaintiff.

Respectfully submitted,

Ashley M. Murray
Ashley M. Murray

Matthew M. Popp
Matthew M. Popp

Cameron J. Tober
Cameron J. Tober

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